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October 26, 2018

Via ECF

AUSA Catherine M. Mirabile
AUSA Lara Gatz
AUSA Christopher Caffarone
United States Attorney's Office
Eastern District of New York
610 Federal Plaza
Central Islip, New York 11722

Re: United States v. Edward Mangano
Criminal Docket No.: 16-540 (SJF)

Counsel:

As you are aware, I am attorney for Mr. Mangano. I hereby make demand for the production of the following items:

- The 3500 material disclosed after the initial trial in this matter including proffer statements by Jay Jadeja who advised, among other things, that Fred Mei was repeatedly paid for handling real estate matters for Singh with thick envelopes containing cash. We have not received, but are hereby demanding, a full accounting of all things of value which Fred Mei received from Singh, including all payments received in connection with his purported legal work. Moreover, we further request disclosure as to whether such payments were reported by Mr. Mei on his tax returns. We additionally make demand as to whether Harendra Singh paid for any part of the condominium purchased by Mei in Mexico.
- Prior to the initial trial in this matter, we made demand for the production of the Financial Disclosure Form prepared by Singh, which is customarily required by the U.S. Attorney's Office of a cooperator who has been a participant in financial crimes. In response, the

Government advised, in writing, that Singh was not required to prepare a Financial Disclosure Form. We hereby reiterate our demand for any such Financial Disclosure Form prepared by Mr. Singh.

Very truly yours,



KEVIN J. KEATING

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